UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	

------ X

MOHAMMED RAZZAK, MOHAMMAD SIDDIQUE, and MOHAMMAD ISLAM, on behalf of themselves and other similarly situated,

Case No. 17-cv-4373 (DLC)

Plaintiffs,

v.

JUNO USA, LP, VULCAN CARS LLC, TALMON MARCO, and GT FORGE, INC. d/b/a GETT,

Defendants.

----- x

NOTICE OF MOTION TO DISMISS THE COMPLAINT BY DEFENDANTS GT FORGE, INC., JUNO USA, LP, AND VULCAN CARS LLC

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Ronen Ben-David dated August 4, 2017, with exhibits attached thereto, the Declaration of Avital Sterngold dated August 4, 2017, with exhibits attached thereto, defendants GT Forge, Inc., Juno USA, LP, and Vulcan Cars LLC will move before the Honorable Denise L. Cote, United States District Judge, Southern District of New York, 500 Pearl Street, New York, N.Y. 10007, at a time to be determined by the Court, for an order dismissing plaintiffs' complaint in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) for lack of subject matter jurisdiction or, in the alternative, for failure to state a claim upon which relief can be granted.

Dated: New York, New York. August 4, 2017

DLA PIPER LLP (US)

By: /s/ John J. Clarke

John J. Clarke, Jr.

john.clarke@dlapiper.com

Keara M. Gordon

keara.gordon@dlapiper.com

1251 Avenue of the Americas New York, New York 10020

(212) 335-4500 Tel: (212) 884-8520 Fax:

Attorneys for Defendants GT Forge, Inc., Juno USA, LP, and

Vulcan Cars LLC